

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES E. SHELTON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

**PRO SOURCE LENDING GROUP LLC,
D/B/A FAST FUND GROUP, D/B/A FAST
FUNDS GROUP**

AND

BRITTNEY WILSON

Defendants.

Case No.
24-4394

CLASS ACTION

JURY TRIAL DEMANDED

DECLARATION OF JAMES E. SHELTON

1. My name is James E. Shelton. I am over 18 years old. I can testify competently to the undersigned statements.

2. My telephone number 484-XXX-XXXX is on the National Do-Not-Call Registry and has been since I placed it there on June 26, 2015.

3. I am the user of 484-XXX-XXXX.

4. I pay the bill for 484-XXX-XXXX.

5. This number is used for personal, family, and household purposes. I do not use it for business purposes or business use at all.

6. I have not used the number for business purposes or business use since at least June of 2019.

7. I only used the number for business purposes while I was running my business, Final Verdict Solutions, part time while I was attending university, between March 7, 2016, when I started Final Verdict Solutions, and June of 2019, when I started running Final Verdict Solutions full time and obtained a separate business number that I use for Final Verdict Solutions, 484-312-3300.

8. Final Verdict Solutions' telephone number, which is held out to the public as its telephone number, is 484-312-3300.

9. I no longer hold my cell phone number at issue here out to the public as a business telephone number, including for Final Verdict Solutions, and have not done so since June of 2019.

10. I removed my cell phone number from Final Verdict Solutions' website and Google business listing sometime in June of 2019. Moreover, the website screenshot of my website contained in the Cialino Declaration at Page 11 is from approximately 2017 or 2018, and is two versions and more than 7 years out of date.

11. Currently, those resources, including Final Verdict Solutions' website, all list the 484-312-3300 number.

12. As such, anyone Googling Final Verdict Solutions or looking to get in contact with it will be directed to the 484-312-3300 number. Pro Source and everyone else in the public has been on notice since at least June of 2019 that 484-312-3300 is Final Verdict Solutions' telephone number, and not my cell phone.

13. With respect to Defendant Pro Source, I notified the Defendant that it was sending illegal calls to my cell phone number on the Do Not Call Registry and later settled those claims with the Defendant in November of 2021.

14. Thus, Defendant Pro Source was on notice at least as far back as 2021 that I did not want to receive calls from them to my cell phone number. I did nothing to encourage Pro Source to continue calling me.

15. This number is assigned to a residential cellular telephone service for consumers, not businesses, and I pay the bill out of my personal accounts, and not out of any business bank account.

16. I also wish to correct the Cialino Declaration's misguided allegations about my business. Final Verdict Solutions is a fictitious name for me, and it is not a front for "manufacturing yet another series of TCPA claims." To the contrary, Final Verdict Solutions is a successful judgment collection business that purchases and collects all manner of judgments, including family court judgments, small claims judgments, tort judgments, landlord-tenant judgments, business judgments, and telemarketing judgments.

17. To be clear, I do nothing to precipitate the illegal calls and messages which are placed to me. I do not want these communications, but they continue to be placed to me. They are highly annoying and disruptive.

18. I have never proactively created or found TCPA claims nor entrapped businesses. I do not welcome nor invite these illegal calls and have taken measures for them to stop, including by placing my number on the Do-Not-Call Registry and holding those who call me accountable for their actions.

19. I was harmed by the Defendants' calls. I was deprived of legitimate use of network resources, bandwidth, power, and storage space and my privacy was improperly invaded. Additionally, my statutory rights as recognized by the TCPA were violated. Illegal calls are frustrating, obnoxious, and annoying. They are a nuisance and disturbed my solitude.

20. My number is on the Do-Not-Call Registry, and I did not provide any consent for anyone to send the calls at issue to me, especially after I already informed Pro Source that I objected to such calls and settled with them.

21. I do not maintain any telephone numbers or businesses for the purpose of bringing lawsuits, including under the TCPA.

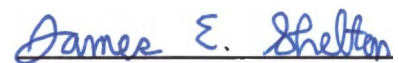
22. I do not and have never welcomed nor wanted illegal calls and do nothing to receive or deserve them. My injury was done completely at the hands of Defendants, who took it upon themselves to call me in violation of the TCPA.

23. I brought this case as a class action because I know that there are likely thousands more people in a similar situation such as myself, having received calls from Defendants without their consent, including after having asked they stop.

24. I brought this case not for personal motives or financial gain, but as a bulwark for the rights of consumers against illegal telemarketing. I was not paid by anyone to do so.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 5th day of February 2025, in the United States of America,



James E. Shelton